## GOLDBERG & WOLF, LLC

WARREN S. WOLF\*
JORDAN B. GOLDBERG\*+

\* MEMBER NJ & PA BARS +CERTIFIED BY THE SUPREME COURT OF NEW JERSEY AS A WORKERS' COMPENSATION LAW ATTORNEY 1949 BERLIN ROAD SUITE 201 CHERRY HILL, NEW JERSEY 08003

> 856-651-1600 FAX 856-651-1615

December 6, 2023

## **VIA ECF ONLY**

Honorable Michael M. Baylson, U.S.D.J. United States District Court for the Eastern District of Pennsylvania James A. Byrne U.S. Courthouse 601 Market Street Philadelphia, PA 19106

> Re: Nicholas v. Plastino Civil Action No. 23-1259

Dear Judge Baylson:

cc:

We are writing to request a second extension of the deadline contained within the Court's Orders of 11/20/23 and 11/30/23. The parties continue to make progress toward a consensual settlement and jointly request an extension to 12/22/23. We do not anticipate needing any further extensions beyond said date. We will email a proposed order to chambers for the Court's consideration.

Thank you for Your Honor's consideration of this joint request.

Respectfully,

/s/ Warren S. Wolf Warren S. Wolf, Esquire

Jonathan P. Vuotto, Esquire, via ECF client w/ encl., via email